

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re: MUBARAK H. IBRAHIM, Debtor.	BK No. 23-07031 Chapter 7 Hon. Jacqueline Cox Hearing date: March 11, 2025 Hearing time: 1:00 P.M. Place: Courtroom 680 or Zoom
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**NOTICE OF CHAPTER 7 TRUSTEE'S PETITION FOR SANCTIONS IN AMOUNT OF
FEES IN CONNECTION WITH MOTION TO COMPEL BADR ALI, WALID ALI, AND
AMMAR ALESAYI**

To: See attached Service List

PLEASE TAKE NOTICE that on **March 11, 2025, at 1:00 P.M.**, I will appear before the Honorable Jacqueline Cox, or any judge sitting in that judge's place, **either** in courtroom 680 of the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, Illinois, **or** electronically as described below, and present the **Chapter 7 Trustee's Petition for Sanctions in Amount of Fees in Connection with Motion to Compel Badr Ali, Walid Ali, and Ammar Alesayi**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 273 2896, and the passcode is 778135. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

Dated: February 25, 2024

GUS A. PALOIAN, in his capacity as the
Chapter 7 Trustee of the Debtor's Estate

By: /s/ Jonathan M. Cyrluk
Jonathan M. Cyrluk

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*Special counsel to Chapter 7 Trustee Gus A.
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**Pro hac vice*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on February 25, 2024, he caused to be served a true and correct copy of each of the **Notice of Chapter 7 Trustee's Petition for Sanctions in Amount of Fees in Connection with Motion to Compel Badr Ali, Walid Ali, and Ammar Alesayi** and the **Chapter 7 Trustee's Petition for Sanctions in Amount of Fees in Connection with Motion to Compel Badr Ali, Walid Ali, and Ammar Alesayi**, to be served via the Court's CM/ECF electronic noticing system, upon all registered participants in this proceeding, so identified on the attached Service List.

/s/ Jonathan M. Cyrluk

Jonathan M. Cyrluk

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SERVICE LIST

Service Via CM/ECF

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Paul Yovanic Jr.	pyovanic@seyfarth.com, tbrown@seyfarth.com

Service Via Certified US Mail

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Hickory Hills, IL 60457-1801

Walid Ali
9201 Orchard Lane
Bridgeview, IL 60455-2215

Ammar Alesayi
5308 W. 109th Street
Oak Lawn, IL 60453-6337

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:

MUBARAK H. IBRAHIM,

Debtor.

BK No. 23-07031

Chapter 7

Hon. Jacqueline Cox

Hearing date: March 11, 2025

Hearing time: 1:00 P.M.

Place: Courtroom 680 or Zoom

**CHAPTER 7 TRUSTEE'S PETITION FOR SANCTIONS IN AMOUNT OF FEES IN
CONNECTION WITH MOTION TO COMPEL BADR ALI, WALID ALI, AND AMMAR
ALESAYI**

Gus A. Paloian, in his capacity as the Chapter 7 trustee of the bankruptcy estate of the debtor, Mubarak H. Ibrahim, respectfully submits this petition for fees in connection with his motion to compel Badr Ali, Walid Ali, and Ammar Alesayi (collectively, "Respondents").

1. On February 4, 2025, the trustee filed a motion to compel Badr Ali, Walid Ali, and Ammar Alesayi. (Dkt. 99.)

2. On February 11, 2025, the Court granted the motion and awarded the trustee his fees incurred in drafting and bringing the motion. (Dkt. 104.)

3. Attached as **Exhibit 1** is an affidavit setting forth the attorney hours the Trustee incurred in filing, serving, and appearing for the motion to compel. These total \$4,570.00. The trustee's fees are summarized in this table:

Professional	Title	Hourly rate	Total hours	Value of services
Jonathan M. Cyrluk	Partner	\$700.00	2.3	\$1,610.00
Steven C. Moeller	Senior Managing Counsel	\$400.00	7.4	\$2,960.00

Total			9.7	\$4,570.00
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(**Exhibit 1** ¶¶ 5-8.)

4. The foregoing fees are reasonable. This Court typically employs the lodestar approach. *In re Am. Telecom Corp.*, 319 B.R. 857, 874 (Bankr. N.D. Ill. 2004). In that approach, the court uses the attorney's standard hourly rate. *Gusman v. Unisys Corp.*, 986 F.2d 1146, 1150 (7th Cir. 1993). As shown in the affidavit, those are the rates employed in this petition. (**Exhibit 1** ¶¶ 5-6.)

WHEREFORE, the Trustee respectfully requests that the Court enter an order imposing sanctions against Respondents on a joint and several basis in the amount of \$4,570.00 and granting any other relief the Court deems just and proper.

Dated: February 25, 2025

GUS A. PALOIAN, not individually or personally, but solely in his capacity as the Chapter 7 Trustee of the Debtor's Estate

By: /s/ Jonathan M. Cyrluk
Jonathan M. Cyrluk

Counsel to Chapter 7 Trustee Gus A. Paloian

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**Admitted Pro hac vice*